

1 **IN THE UNITED STATES DISTRICT COURT**
2 **FOR THE WESTERN DISTRICT OF OKLAHOMA**

3 ISABELA SNEED,)
4 Plaintiff,)
5 vs.) Case No. 22-cv-00031-R
6 INDEPENDENT SCHOOL)
7 DISTRICT NO. 16 OF)
8 PAYNE COUNTY,)
9 Defendant.)

10
11 **DEPOSITION OF**
12 **SETH CONDLEY**

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18
19 DATE: MARCH 1, 2023

20 REPORTER: MARISA SPALDING, CSR, RPR

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22
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EXHIBIT

3

A P P E A R A N C E S:

FOR THE PLAINTIFF:

SMOLEN & ROYTMAN, P.L.L.C.
701 South Cincinnati Avenue
Tulsa, Oklahoma 74119
BY: **MR. DANIEL E. SMOLEN**

MOORE-SHRIER LAW FIRM
624 South Boston Avenue,
Suite 1070
Tulsa, Oklahoma 74119
BY: **MR. DREW MATHEWS**

FOR THE DEFENDANT:

ROSENSTEIN, FIST & RINGOLD
525 South Main Street, Suite 700
Tulsa, Oklahoma 74103
BY: **MS. SAMANTHIA MARSHALL**

ALSO PRESENT: Jeremiah Gregory

DEPOSITION OF **SETH CONDLEY**, produced as
a witness duly sworn by me, taken in the
above-styled and numbered cause on the 1st
day of March, 2023, at 9:36 a.m., before
MARISA SPALDING, Certified Shorthand
Reporter No. 01750 in and for the State of
Oklahoma, at the offices of Smolen &
Roytman, 701 South Cincinnati Avenue,
Tulsa, Oklahoma, in accordance with the
agreement hereinafter set forth.

A G R E E M E N T S

It is hereby agreed by and between the parties hereto, through their respective attorneys appearing herein, that the Plaintiff may take the deposition of **SETH CONDLEY** at this time, that said deposition is being taken by Subpoena and said deposition is being taken with the same force and effect as though all the requirements of the Rules and Statutes had been fully complied with.

It is further agreed by and between the parties hereto, through their attorneys appearing herein, that any and all objections to any question, except as to form contained herein, may be made upon the offering of this deposition in evidence upon the trial of this cause with the same force and effect as though the witness were present in person and testifying from the witness stand.

It is further agreed by and between the parties hereto, through their attorneys appearing herein, that this deposition may be signed before any Notary Public and

1 thereafter returned into Court and used
2 upon the trial of this cause with the same
3 force and effect as though all requirements
4 of the Rules and Statutes with reference to
5 signature and return had been fully
6 complied with.

7 It is further agreed by and between the
8 parties hereto, through their attorneys
9 appearing herein, that if the original of
10 this deposition has not been properly
11 signed before any officer authorized to
12 administer oaths within (30) days after its
13 submission to said witness and thereafter
14 returned to the attorney who asked the
15 first question appearing in the transcript
16 prior to any contested hearing in this
17 cause, that an unsigned, certified copy may
18 be substituted and used for all purposes,
19 the same as though the original had been
20 signed by said witness and properly
21 returned.

INDEX**PAGE**

Appearances	2
Agreements	3
SETH CONDLEY	
Examination by Mr. Smolen	6
Jurat	91
Correction Sheet	92
Reporter's Certificate	93

EXHIBIT INDEX

NUMBER	DESCRIPTION	PAGE
PX 1	Complaint	22
PX 4	Police Report	32
PX 5	Police Report	33
PX 15	Emails	38
PX 14	Evaluation	81

1 A Yeah.

2 Q And so in this email, it starts off
3 with Mr. Morejon stating -- I'm on the last
4 page here. It looks like it starts off
5 with him saying: During FTC, whenever I
6 was being a dedicated baseball coach and
7 working for \$2 an hour, someone came into
8 my room and took slash stole my Hawaiian
9 license plate.

10 I honestly forgot about this, but the
11 kids have put me in depression today and I
12 randomly remembered the one thing that
13 makes me smile during the day, the rainbow
14 on the license plate. If anyone has seen
15 this license plate, please return it. I'm
16 really missing it.

17 And then I see a response from Trevor
18 Fieldson that goes to Mr. Morejon, and it
19 goes to the JH staff, and he responds and
20 he says: Maybe one of your 9th grade
21 female entourage took it for a souvenir
22 what looks like to be kind of a smiley
23 face. Did you ever see Mr. Morejon with a
24 female entourage?

25 A I never saw females. There were

1 students. It was -- it wasn't just
2 females.

3 Q Okay. But he's pretty clear in the
4 -- in the email --

5 A Uh-huh.

6 Q -- right, that maybe one of your 9th
7 grade female entourage took it for a
8 souvenir. He was pretty specific about it
9 being 9th grade, and he was pretty specific
10 about it being female. Do you remember him
11 having a number of female 9th grade girls
12 that would follow him or hang out with him
13 in Spring of 2019?

14 A I wouldn't say specific girls.
15 Again, it was -- there were boys. It was
16 groups, just students that would -- but --
17 but it was during passing period, some come
18 down to the classroom so -- but it was -- I
19 never witnessed just all girls.

20 Q Okay. Was it majority females but a
21 few males in there?

22 A Yes. If -- if -- does that make --

23 Q Yeah, I mean, I just want to know
24 what you saw.

25 A Yes.

1 Q Because obviously Mr. Fieldson saw
2 something, right --

3 A Uh-huh.

4 Q -- that made him respond to the
5 entire JH staff.

6 A Uh-huh.

7 Q Maybe one of your 9th grade female
8 entourage --

9 A Yeah.

10 Q -- has it?

11 A Uh-huh.

12 Q Do you have -- let me ask you this.
13 Do you have any issues with Mr. Fieldson?

14 A No, sir.

15 Q Okay. You don't consider him to be
16 a dishonest person or anything, do you?

17 A No, sir.

18 Q I've never met the man. I think I'm
19 going to take his deposition today, but
20 nothing that stands out in your mind that
21 --

22 A He is Brit so don't hold that
23 against him.

24 Q Okay. I won't. I'll try not to. I
25 know a couple of those. I was with one

1 last night having dinner, actually. What
2 -- when you say that this group of students
3 would be with Mr. Morejon in between
4 breaks, when would that be? What did the
5 breaks look like?

6 A Just passing period.

7 Q And what is that when you say
8 passing period?

9 A Between classes.

10 Q And would they be in his classroom
11 with him?

12 A Yeah, yeah, there would be, yes,
13 multiple students, yes, in between --
14 between passing -- between when the bell
15 rings for tardies.

16 Q And was that a common practice for
17 other faculty?

18 A Yes.

19 Q Okay. Had you ever talked to Mr. --
20 or did you ever just talk to Mr. Fieldson
21 after he sent this?

22 A No, I don't even remember this.

23 Q Okay.

24 A This email chain, sorry.

25 Q Right. And I'm assuming you guys